

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION**

UNITED STATES OF AMERICA

VS.

RICARDO QUINTANILLA, et. al.

§
§
§
§
§

Criminal No. 7:19-cr-01995-1

**UNOPPOSED MOTION TO TRAVEL OUTSIDE
OF THE SOUTHERN DISTRICT OF TEXAS**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, RICARDO QUINTANILLA, Defendant in the above entitled and numbered cause, and requests the Court's permission to travel outside of the Southern District of Texas, McAllen Division and for good cause shows the following:

I.

Defendant is currently restricted to travel within the Southern District. Defendant's mother's brother, Enrique Peña Sr., passed away on February 29, 2020 in San Bernardino, California, where he lived. Enrique Peña Sr's. funeral services will be held at Green Acres Memorial Park, located at 11715 Cedar Avenue, Bloomington, California, 92316, on March 10, 2020 and March 11, 2020. Defendant respectfully requests permission to travel to San Bernardino, California, in the central district to attend the funeral and be with family from March 9, 2020, to March 13, 2020.

II.

WHEREFORE PREMISES CONSIDERED, Defendant respectfully prays that this Court grant him permission to travel outside the Southern District of Texas McAllen Division as requested.

Respectfully submitted,

PEÑA ALECZANDER

3900 N. 10TH ST STE 1050

McALLEN, TEXAS 78501

Telephone: (956) 948-2221

Facsimile: (888) 422-6821

Email: jpena@penaaleczander

By: /s/ Jaime Peña

JAIME PEÑA

State Bar No. 90001988

CERTIFICATE OF CONFERENCE

This is to certify that prior to the filing of the foregoing motion that the undersigned defense counsel conferred with Assistant United States Attorney in regard to this motion. The Government indicated that it is not opposed to the motion.

/s/ Jaime Peña

JAIME PENA

CERTIFICATE OF SERVICE

I, Jaime Peña, hereby certify that a copy of the above and foregoing Motion has been electronically delivered to the Assistant United States Attorney, United States Attorney's Office, 1701 West Business Highway 83, McAllen, Texas.

/s/ Jaime Peña

JAIME PENA